

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

Andrew Carr,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	Case No: 1:17-CV-00620
	)	Judge Nugent
Detective Alfred Johnson,	)	
et al.,	)	
	)	
Defendants.	)	

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Deposition of Andrew Carr, the plaintiff  
herein, called by the Defendant Detective Alfred  
Johnson for cross-examination pursuant to the  
Federal Rules of Civil Procedure, taken before  
Constance Versagi, Notary Public in and for the  
State of Ohio, at Burke Lakefront Airport, 1501  
Marginal Road, Cleveland, Ohio on Thursday, August  
23, 2018, commencing at 10:00 a.m.

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1 APPEARANCES:

2 On behalf of the Plaintiff:

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11 On behalf of the Defendant Det. Alfred Johnson:

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22 On behalf of the Defendants Officers Steven Davis  
23 and Keith Kulak and City of Solon:

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WITNESS:

CROSS

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(No exhibits marked.)

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ANDREW CARR

of lawful age, being first duly sworn, as  
hereinafter certified, was examined and testified  
as follows:

CROSS-EXAMINATION

By Mr. Bacevice:

Q Good morning. Can you please state and spell  
your name for the record?

A Andrew Carr, A N D R E W, C A R R.

Q Good morning, Mr. Carr. My name is Jack  
Bacevice. I'm an attorney with the City of  
Cleveland. I represent Detective, now  
Sergeant Alfred Johnson in this matter.

A Good morning.

Q I'm going to be taking your deposition this  
morning. Have you ever had your deposition  
taken before?

A No.

Q Let's go over some ground rules. It's pretty  
simple. I'm going to ask you straightforward  
questions to the best of my ability. You are  
going to have to give me straightforward  
answers, okay?

A Okay.

Q One of the first things, you have to answer

1 A Know what?

2 Q You don't know for certain that she had it in  
3 Bedford. You just know it wasn't in the house  
4 that day?

5 A I don't think it was in house that day.

6 Q At some point he got it back from your mom, or  
7 it's your stepmom right?

8 A Yes, my stepmom.

9 Q He got it back from her at some point because  
10 he has it now, right?

11 A Yes.

12 Q You just don't know when?

13 A No, I don't.

14 Q So, you were arrested, right?

15 A Yes.

16 Q Do you know who put you under arrest?

17 A When I was in -- actually in the jail, or  
18 like --

19 Q On the scene, do you know who put handcuffs on  
20 you?

21 A No.

22 Q Do you know what department? Do you know  
23 anything about the person who put handcuffs on  
24 you?

25 A No, I don't.

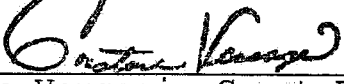
1 State of Ohio, )  
 2 County of Cuyahoga. ) SS: CERTIFICATE

3 I, Constance Versagi, Court Reporter and  
 4 Notary Public in and for the State of Ohio, duly  
 5 commissioned and qualified, do hereby certify that  
 6 the within named witness, Andrew Carr,  
 7 was by me first duly sworn to testify the truth, the  
 8 whole truth, and nothing but the truth in the cause  
 9 aforesaid; that the testimony then given by him was  
 10 by me reduced to stenotypy/computer in the presence  
 11 of said witness, afterward transcribed, and that the  
 12 foregoing is a true and correct transcript of the  
 13 testimony so given by him as aforesaid.

14 I do further certify that this deposition was  
 15 taken at the time and place in the foregoing caption  
 16 specified, and was completed without adjournment.

17 I do further certify that I am not a relative,  
 18 counsel, or attorney of either party, or otherwise  
 19 Interested in the event of this action.

20 IN WITNESS WHEREOF, I have hereunto set my  
 21 hand and affixed my seal of office at Cleveland,  
 22 Ohio, on this 5th day of September, 2018.

23   
 24 Constance Versagi, Court Reporter and  
 25 Notary Public in and for the State of Ohio.  
 My Commission expires January 14, 2023.

